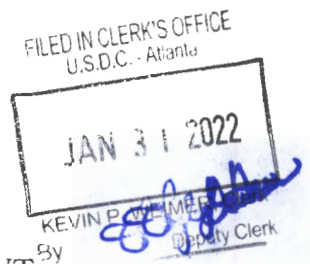


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION



IN RE: EQUIFAX INC. CUSTOMER  
DATA BREACH LITIGATION

MDL No. 1:17-md-2800-TWT

CONSUMER ACTIONS

Honorable Thomas W. Thrash, Jr.

**OMINBUS RESPONSE TO OBJECTORS FRANK AND WATKINS'**  
**MOTION FOR RETURN OF APPEAL BOND [1223], AND**  
**OBJECTOR SHIYANG HUANG'S MOTION TO RETURN APPEAL BOND**

Objector Shiyang Huang moves for an order returning \$2,000 appeal bond he posted to secure Plaintiffs' costs. *See* Dkt. 1223 at 1-2 (backgrounds).

Because appeal bonds are intended to secure *costs on appeal*, *see* Dkt. 1212, any proposal must ensure that Plaintiffs will recover the costs they are entitled to.

Huang surveyed all objectors, and below collects his best current understanding:

Objector(s)	Status on Appeal Bond	On Payment of Costs
John W. Davis	No order requiring Davis post bond	Davis claims that a check (#3661) for \$70.13 was sent to Barnes Law Group
Chris Andrews	No bonds paid yet	Andrews claims that he sent a \$71 check to this Court. Huang is not able to verify as of January 26.
Shiyang Huang	\$2,000 bond posted. Receipt No. GAN100121456. Dkt. 1117	Huang hereby moves for refund less \$70.13 in costs.
Mikell West	\$2,000 bond posted. Receipt No. 121419. Text Entry (05/19/2020)	No papers filed as of yet.
George Cochran	\$2,000 bond posted. Receipt No. 121501. Text Entry (05/19/2020)	Cochran moved for refund less \$70.13 in <i>pro rata</i> cost
Theodore Frank & David Watkins	\$4,000 bond posted. Receipt No. GAN100121345. (05/12/2020).	They moved for a refund less \$420.75 costs total

As the foregoing table shows, Plaintiffs already have their costs entirely secured, because Objectors Frank and Watkins' moved voluntarily withhold \$420.75 solely for Plaintiffs' security. To make sure Plaintiffs are paid *entire* amount of \$420.75 in any case, the Court may grant Huang's motion as in either option below, after Objectors Andrews and Davis' representations are confirmed:

- A. The Court may issue an order granting Huang's motion for the return of \$1,929.87, net of \$70.13 for his *pro rata* share of Plaintiffs' costs on appeal.
- B. The Court may issue an order granting Huang's motion in full, while granting Frank/Watkins' motion. If Huang recovers less than \$1,929.87, Huang reserves his right to privately collect from other objectors who has yet paid their fair share of costs. Dkt. 1223 at 2. But if Huang's \$2,000 bond on appeal is not returned in full, he owes nothing to other Objectors. *Ibid*.

### **CONCLUSION**

Huang's motion to return appeal bonds should be granted.

If this Court grants Objectors Frank and Watkins' motion in full, Dkt. 1223, (which seeks a refund net of entirety of Plaintiffs' appeal costs), then Huang seeks an order returning \$2,000 of bonds to Huang.

If this Court denies Objector Frank and Watkins' motion, then Huang seeks an order that returns \$1,929.87 back to Huang, once Plaintiffs' costs are secured from a combination of all objectors who filed appeals.

Dated: January 26, 2022

Respectfully Submitted,

Shiyang Huang  
/s/ Shiyang Huang  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2022, I filed the foregoing motion via U.S. Mail and the foregoing will be docketed via this Court's CM/ECF system, from which participants in the case will be served.

/s/ Shiyang Huang